Commonwealth of Kentucky
Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

Completed by: Whitney Harrison

GENERAL INFORMATION:

Name:	Sun Chemical Corporation, Wurtland Facility
Address:	100 Wurts Road Wurtland, KY 41144
Date application received:	May 13, 2003
SIC/Source description:	2865/Pigment Intermediate Manufacturers
AFS Plant ID / EIS #:	21-089-00032
Application log number:	55749 & 53161
Permit number:	V-99-010 (Revision 2)

APPLICATION TYPE/PERMIT ACTIVITY:

[ ] Initial issuance
[x] Permit modification
__Administrative
__Minor
X Significant
[ ] Permit renewal
[ ] General permit
[ ]Conditional major
[x] Title V
[x] Synthetic minor
[x] Operating
[ ] Construction/operating

COMPLIANCE SUMMARY:

[ ] Source is out of compliance
[x] Compliance certification signed
[ ] Compliance schedule included

APPLICABLE REQUIREMENTS LIST:

[ ] NSR
[ ] PSD
[ ] Netted out of PSD/NSR
[x] NSPS
[ ] NESHAPS
[ ] Not major modification per 401 KAR 51:017, 1(23)(b) or 51:052,1(14)(b)
[x] SIP
[ ] Other

MISCELLANEOUS:

[ ] Acid rain source
[ ] Source subject to 112(r)
[ ] Source applied for federally enforceable emissions cap
[ ] Source provided terms for alternative operating scenarios
[ ] Source subject to a MACT standard
[ ] Source requested case-by-case 112(g) or (j) determination
[ ] Application proposes new control technology
[x] Certified by responsible official
[x] Diagrams or drawings included
[ ] Confidential business information (CBI) submitted in application
[ ] Pollution Prevention Measures
[ ] Area is non-attainment (list pollutants):

EMISSIONS SUMMARY BASED ON PROPOSED PERMIT REVISION 1

The emissions in this table are based on a production rate permit limit included in V-99-010 (Revision 1) of 8,000 tons per year of Copper Phthalocyanine Crude Blue. The changes in emissions from the old production rate permit limit in V-99-010 of 6,600 tons per year of Copper Phthalocyanine Crude Blue are listed in parentheses.

Pollutant	Actual (tpy)	Potential (tpy)
PM	37.7 (+6.3)	51.3 (+8.6)
PM10	19.6 (+3.2)	25.8 (+4.3)
SO2	19.0 (+5.3)	19.0 (+5.3)
NO_X	73.5 (+8.4)	73.5 (+8.4)
CO	24.8 (+0.3)	24.8 (+0.3)
VOC	66.7 (+11)	90.2 (+11)
Ammonia	68.6 (+12)	5720 (+1000)
Dioxin	0.00000199 (+0.00000034)	0.00000199 (+0.00000034)
HAP = 10 tpy (by CAS)		
1,2,4-Trichlorobenzene	55.5 (+9.3)	75.2 (+9.4)
Naphthalene	0.278 (+0.047)	0.374 (+0.047)
PCB	0.0133 (+0.0023)	0.0133 (+0.0023)
Hydrogen Chloride	15.3 (+2.6)	15.3 (+2.6)

EMISSIONS SUMMARY BASED ON PROPOSED PERMIT REVISION 2

The emissions in this table are based on a production rate permit limit included in V-99-010 (Revision 2) of 11,000 tons per year of Copper Phthalocyanine Crude Blue. The changes in emissions from the old production rate permit limit in V-99-010 of 8,000 tons per year of Copper Phthalocyanine Crude Blue are listed in parentheses.

Pollutant	Actual (tpy)	Potential (tpy)
PM	38.3 (+0.6)	60.9 (+9.6)
PM10	20.4 (+0.8)	30.6 (+4.8)
SO2	13.7 (-5.3)	13.7 (-5.3)
NO_X	71.7 (-1.8)	71.7 (-1.8)
CO	27.1 (+2.3)	27.1 (+2.3)
VOC	46.4 (-20.3)	57.2 (-30.0)
Ammonia	70.4 (+1.8)	5940 (+220)
Dioxin	0.00000165 (-0.00000034)	0.00000165 (-0.00000034)
HAP = 10 tpy (by CAS)		
1,2,4-Trichlorobenzene	29.0 (-26.5)	35.8 (-39.4)
Naphthalene	0.389 (+0.111)	1.45 (+1.076)
PCB	0.0110 (-0.0023)	0.0110 (-0.0023)
Hydrogen Chloride	3.68 (-11.62)	3.68 (-11.62)

SOURCE PROCESS DESCRIPTION:

Sun Chemical Corporation, Wurtland Facility manufactures CPC Blue, a pigments intermediate feed stock by reacting Urea, Phthalic Anhydride and Cuprous Chloride in six batch reactors. After the reaction cycle is completed, material is decanted, washed, filter pressed and dried.

Ammonia is produced as a byproduct of the reaction. Reaction solvent is lost during the drying process. A carbon bed adsorber is used to recover solvent. Ammonia and solvent emissions are controlled by a low NOx afterburner system (Noxidizer).

EMISSION AND OPERATING CAPS DESCRIPTION:

The following is an operating limitation that has changed from the original issuance of permit number V-99-010 to V-99-010 (Revision 2). It is included under emission point (3) Production of Section B.

V-99-010
Pursuant to 401 KAR 63:021 and Agreed Order #DAQ-17972-114, production rate of Copper Phthalocyanine Crude Blue shall not exceed 6,600 tons/year for any consecutive twelve months.

V-99-010 (Revision 1)
Pursuant to 401 KAR 63:021 and Agreed Order #DAQ-17972-114, the production rate of Copper Phthalocyanine Crude Blue shall not exceed 8,000 tons/year for any consecutive twelve months.

V-99-010 (Revision 2)
Pursuant to 401 KAR 63:021 and Agreed Order #DAQ-17972-114, the production rate of Copper Phthalocyanine Crude Blue shall not exceed 11,000 tons/year for any consecutive twelve months.